

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**PROFESSIONAL SALES AND
MARKETING GROUP, INC.,**

Plaintiff,

v.

RENETTO, LLC,

and

SWIMWAYS CORPORATION,

Defendants.

Case No.: 1:07-cv-03951

**INITIAL DISCLOSURES OF DEFENDANT RENETTO, LLC PURSUANT
TO FED. R. CIV. PROC. 26(a)(1)**

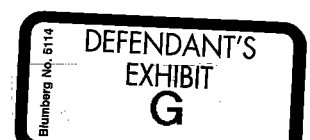
Pursuant to the court's docket entry made Tuesday, September 25, 2007, and in compliance with Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Renetto, LLC ("Renetto") hereby provides the following initial disclosures:

1(A) The following individuals are likely to have discoverable information that Renetto may use to support its claims or defenses:

David Reeb, Black Star Circle, Columbia, Maryland 21045, one of the three members of Renetto, LLC and one of the inventors of the Canopy Chair at issue.

Walter Paul Robinett, 718 Mest Muirwood Drive, Phoenix, AZ 85045, one of the three members of Renetto, LLC, one of the inventors of the Canopy Chair at issue, and participant in negotiations with Plaintiff PSM.

Steven Tinto, a citizen of the state of Arizona, and participant in negotiations with Plaintiff PSM.



Anthony Vittone, Vice President and General Counsel of Defendant Swimways, Inc., who had personal contact with Howard Schraiberg, CEO of Plaintiff PSM regarding Renetto's Canopy Chair.

Howard Schraiberg, CEO of Plaintiff PSM.

Todd Schraiberg, also employed by Plaintiff PSM.

William S. Ramsey, Esq., Renetto's patent attorney, 5253 Even Star Pl., Columbia, Maryland.

1(B) Documents and tangible things that Renetto may use to support its claims or defense include:

Exemplars of Renetto's Canopy Chair;

Exemplars of PSM's Canopy Chair, which Renetto believes is in the possession of PSM;

Documents and summaries relating to sales volume, the sales revenues and the costs incurred by PSM in connection with its sales of Canopy Chairs, which Renetto believes is in the possession of PSM;

U.S. Patent Application No. 20070040422 which is publicly available on the Internet at <http://www.uspto.gov>;

PCT Patent Publication number: WO2007018926 which is publicly available on the Internet at <http://www.espacenet.com/>

Documents and email communications between Renetto and PSM, PSM and Swimways, and Renetto and Swimways, in connection with the Canopy Chairs, which are in the possession of the respective parties;

Renetto's investigation of the facts and circumstances surrounding this matter is ongoing. If additional information/documentation is obtained after the date of these disclosures, Renetto reserves the right to supplement these disclosures and/or provide additional information through the discovery process pursuant to Rule 26(e) of the Federal Rules of Civil Procedure.

1(C) Damages: Renetto has filed a separate lawsuit in the Eastern District of Virginia in which they claim damages from Plaintiff's continued unauthorized sales of the Canopy Chairs, and damages from breach of contract including all unpaid royalties owed to Renetto, and other proceeds made by PSM from their wrongful breach of contract including direct or indirect profits and revenues realized from or attributable to Defendants' manufacturing and sale of unauthorized versions of the Canopy Chair and Related Chairs.

Renetto's investigation into the facts and circumstances surrounding this matter is ongoing, and it will supplement these disclosures as appropriate under the Federal Rules of Civil Procedure and the local rules of the Court.

1(D) Insurance: At this time, Renetto does not believe that it is a party to any agreement under which it's insurer may be liable to satisfy all or part of a judgment which may be entered in the within action or to indemnify or reimburse for payments made to satisfy any such judgment.

Respectfully submitted,

Counsel for Defendant Renetto
OBERKALER

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 16th day of October, 2007, I served a copy of the foregoing INITIAL DISCLOSURES OF DEFENDANT RENETTO, LLC PURSUANT TO FED. R. CIV. PROC. 26(a)(1) by depositing the same in the United States mail, properly addressed, and postage prepaid, upon the following counsel of record for the Plaintiff Professional Sales and Marketing Group, Inc.:

John J. Curry
Anthony J. Nasharr
Carina M. C. Segalini
Polsinelli, Shalton, Welte, Suelthaus, PC
180 North Stetson Avenue, Suite 4525
Chicago, Illinois 60601

A handwritten signature in black ink, appearing to be "J. Curry", written over a horizontal line.